



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

SEP 24 2012

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Lason Kirkland  
Operations Manager  
Perma-Fix of South Georgia, Inc. (PFSG)  
Azalea Industrial Park  
1612 James P. Rogers Circle  
Valdosta, Georgia 31601

SUBJ: RCRA Compliance Evaluation Inspection  
EPA ID # - GAD 093 380 814

Dear Mr. Kirkland:

On January 12, 2012, the U.S. Environmental Protection Agency and the Georgia Environmental Protection Division (GA EPD) conducted a RCRA compliance evaluation inspection at your facility located in Valdosta, Georgia, in order to determine its compliance status with RCRA.

Enclosed is the EPA RCRA Site Inspection Report which indicates that violations of RCRA were discovered. A copy of this report has also been forwarded to GA EPD for their action.

If you have any questions, please contact Daryl Himes at (404) 562-8614.

Sincerely,

Larry Lamberth, Chief  
South Enforcement and Compliance Section  
RCRA and OPA Enforcement and Compliance  
Branch

Enclosure

cc: Michael Elster-GA EPD

## RCRA Inspection Report

1) Inspector and Author of Report

Daryl Himes  
Environmental Engineer

2) Facility Information

Perma-Fix of South Georgia, Inc. (PFSG)  
Azalea Industrial Park  
1612 James P. Rogers Circle  
Valdosta, Georgia 31601

EPA ID # - GAD 093 380 814

3) Responsible Official

Lason Kirkland  
Operations Manager

4) Inspection Participants

Daryl Himes, US EPA  
Michael Elster, Georgia Environmental Protection Division (GA EPD)  
Laura Dahlgren, GA EPD  
Andrea Leeth, GA EPD  
Lason Kirkland,

5) Dates and Times of Inspection

January 12, 2012  
12:30 p.m.

6) Applicable Regulations

Resource Conservation Recovery Act (RCRA), 42 U.S.C.A. §§ 6901 to 6992k  
Sections 3005 and 3007 of RCRA, 42 U.S.C.A. §§ 6925 and 6927  
40 Code of Federal Regulations (CFR) Parts 260-270, 273, and 279

The Georgia Hazardous Waste Management Act, §§ 12-8-60 to 83 of the Official Code of Georgia Annotated

The facility filed its most recent Notification of Hazardous Waste Activity on September 2, 2010. The notification submitted by PFCG indicated that the facility was a large quantity generator of hazardous wastes and a treatment and storage facility of hazardous waste (Permit No. HW-020 (S&T)).

9) Findings

Upon arriving at PFSG, the EPA and GA EPD representatives presented their credentials to Lason Kirkland of the facility. Prior to performing a walk-through inspection of the facility, a brief discussion was held with the facility representative about current operations at the facility.

A walk-through inspection of the facility was then conducted. Below are the findings of the walk-through inspection which included the operations in the Drum Storage & Process Area, Drum Sampling and Inspection Area, Drum Processing Area, Waste Bulking and Unloading Area, Drum Storage and Process Area 2, Bulk Storage Tank Farm, Solidification Stabilization Area, and Parking Lot Area (north end of Waste Bulking & Unloading Area).

Drum Storage and Process Area

One 55 gallon over-pack drum located on the west side of Row I (drum identification code - DV14516-2) was not marked with an accumulation start date (Photo 1). **PFSG appeared to be in violation of Permit Condition II.B.11 of Permit No. HW-0020(S&T) by accumulating hazardous waste in a container which was not clearly marked with the date which the accumulation began.**

Four 55-gallon drums (Photos 2 & 3) were observed in Row I-10 without "Hazardous Waste" labels or accumulation start dates. **PFSG appeared to be in violation of Permit Condition II.B.11 of Permit No. HW-0020(S&T) by accumulating hazardous waste in containers which were not clearly marked with the date which the accumulation began or with the words "Hazardous Waste."**

One 55 gallon drum located in the southwest rows was observed without a "Hazardous Waste" label. **PFSG appeared to be in violation of Permit Condition II.B.11 of Permit No. HW-0020(S&T) by accumulating hazardous waste in a container which was not clearly marked with the words "Hazardous Waste."**

A crack in the south concrete containment wall (Photo 6), which was not addressed with sealant, and cracked and missing floor coating (Photo 7&8) were observed in this area. (Note: other locations of cracks or missing coating will also be documented in a GA EPD's CEI report) **PFSG appeared to be in violation of Permit Condition II.B.12 of**



One cubic yard container was observed without an accumulation start date. **PFSG appeared to be in violation of Permit Condition II.B.11 of Permit No. HW-0020(S&T) by accumulating hazardous waste in containers which were not clearly marked with the date which the accumulation began.**

#### Waste Bulking and Unloading Area

At the time of the inspection, one 6000 gallon tanker holding approximately 2000 gallons of hazardous waste flammable liquids (D001) was observed in this area. The tanker was not labeled with the words "Hazardous Waste" or marked with an accumulation start date. **PFSG appeared to be in violation of Permit Condition II.B.11 of Permit No. HW-0020(S&T) by accumulating hazardous waste in containers which were not clearly marked with the date which the accumulation began.** In addition, the tanker was not grounded. (Note: GA EPD's CEI report will include a violation for the facility's failure to ground this tank as required by the facility's permit application.

One covered top truck trailer, which contained primarily solid hazardous wastes, was also observed in this area. At the time of the inspection, the truck was leaking some liquids from the rear end of the trailer. Facility employees proceeded to clean up the spilled material and repackaged the solid materials into a new open top truck trailer at the time of the inspection.

#### Bulk Storage Tank Farm

During an inspection of tanks T210, T208, and T42, two leaking pipe fittings were observed on pipes connected to and beneath tank T42 (Photos 13 & 14). The slowly leaking material was falling onto the unit's concrete secondary containment system. **PFSG appeared to be in violation of Permit Condition IV.D. of Permit No. HW-0020(S&T) by placing hazardous waste in a tank system which is leaking and is not in compliance with the applicable regulations of 40 C.F.R. Part 264 Subparts BB and CC.**

#### Stabilization Area

This area was closed with the use of a metal corrugated wall at the time of the inspection. The area is equipped with two internal baghouses which each drop dust into 55-gallon satellite accumulation drums which were closed and labeled with the words "Hazardous Waste" at the time of the inspection. Four covered roll-off containers were also observed in the area. Each was properly labeled and dated at the time of the inspection.

1/4/2012 – A fire occurred in Tank F-3. The fire was put out by facility personnel without the assistance of fire department personnel.

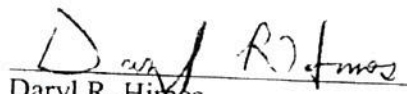
**PFSG appeared to be in violation of Permit Condition II.B.10. of Permit No. HW-0020(S&T) by failing to store incompatible wastes in the same storage area and container without separating the wastes properly with a dike, berm or wall in accordance with 40 C.F.R. § 264.177.**

Record Review

The facility's hazardous waste manifests, personnel training records, contingency plan, permit/permit application, closure plan, waste analysis plan, cost estimates, and inspection records were reviewed

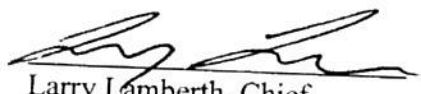
At the time of the inspection, PFSG had not performed a weekly inspection of its permitted container storage area for the week of 12/29/2011. **PFSG appeared to be in violation of Permit Condition IV.F.1., 2., & 3. of Permit No. HW-001(S&T)-3 by failing to inspect its permitted tank storage areas daily and document such inspections.**

10) Signed

  
Daryl R. Himes  
Environmental Engineer

3/6/12  
Date

11) Concurrence

  
Larry Lamberth, Chief  
South Section  
RCRA & OPA Enforcement and Compliance Branch

03/20/12  
Date

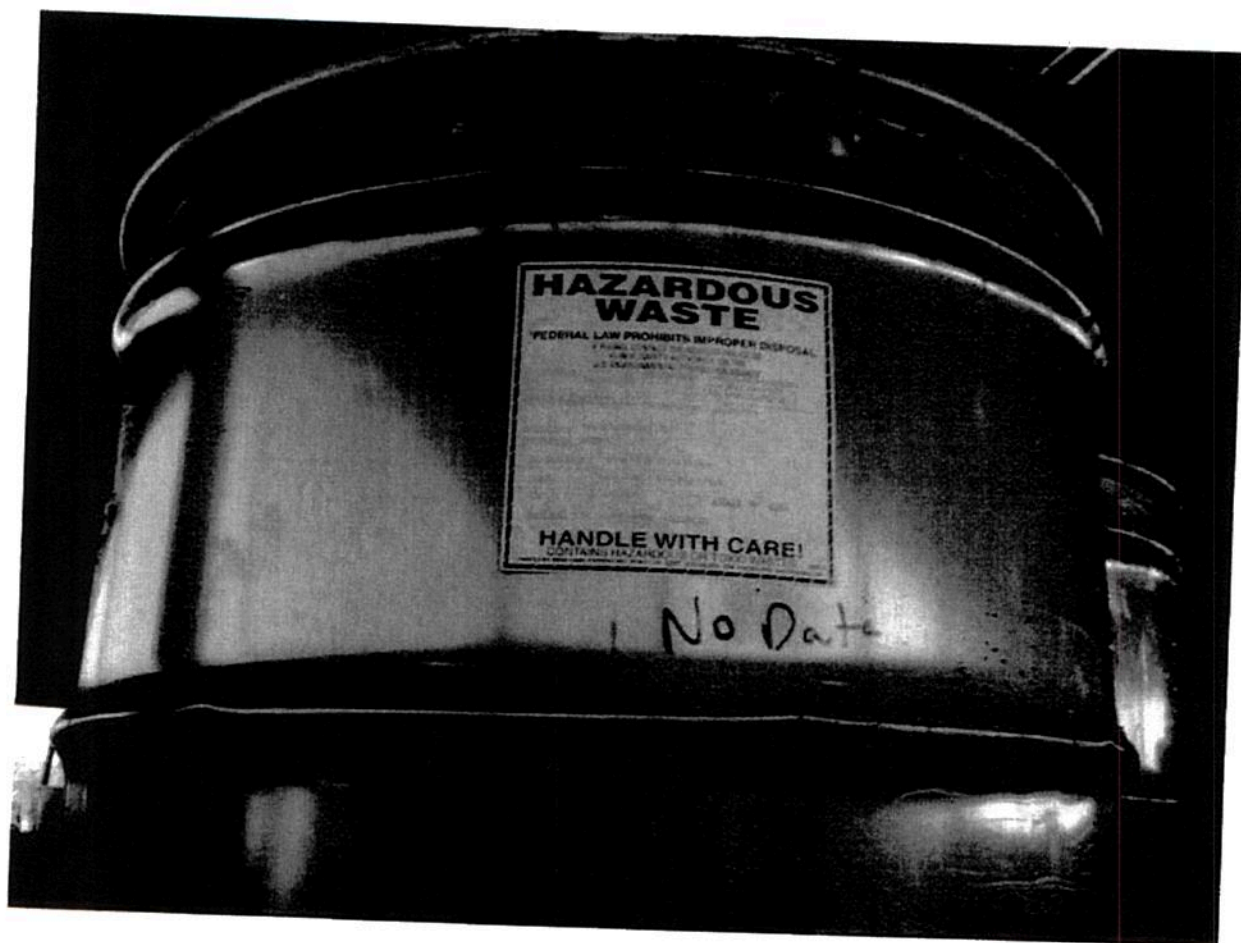


Photo 1 – Drum w/o accumulation start date on the west side of Row 1 Drum ID Number (DV14516-2)



Photo 2 – Four drums w/o accumulation start date or labels in Row I-10





Photo 3 – Four drums w/o accumulation start date or labels in Row I-10



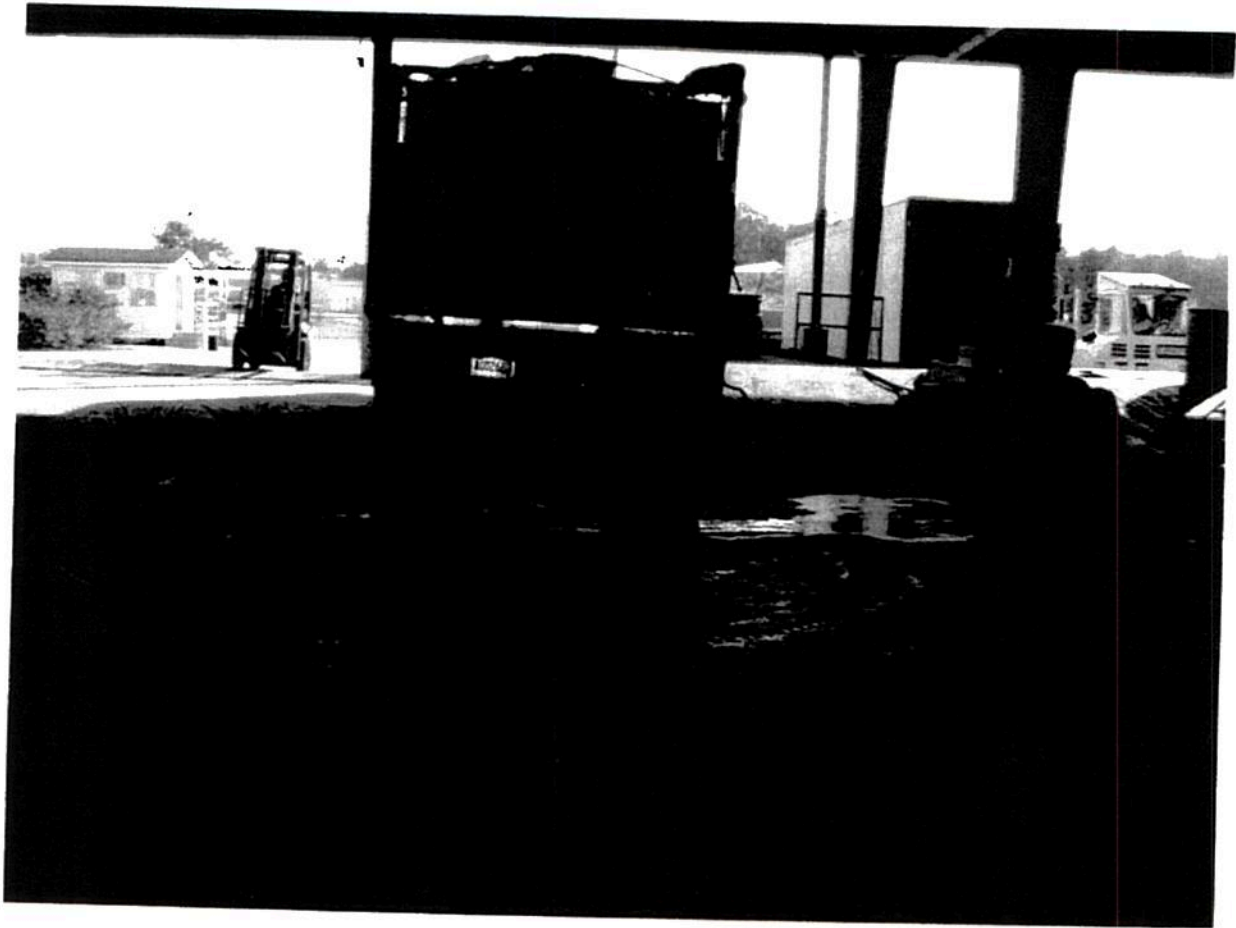


Photo 4 – Liquid leaking from truck located in Waste Bulking and Unloading Area

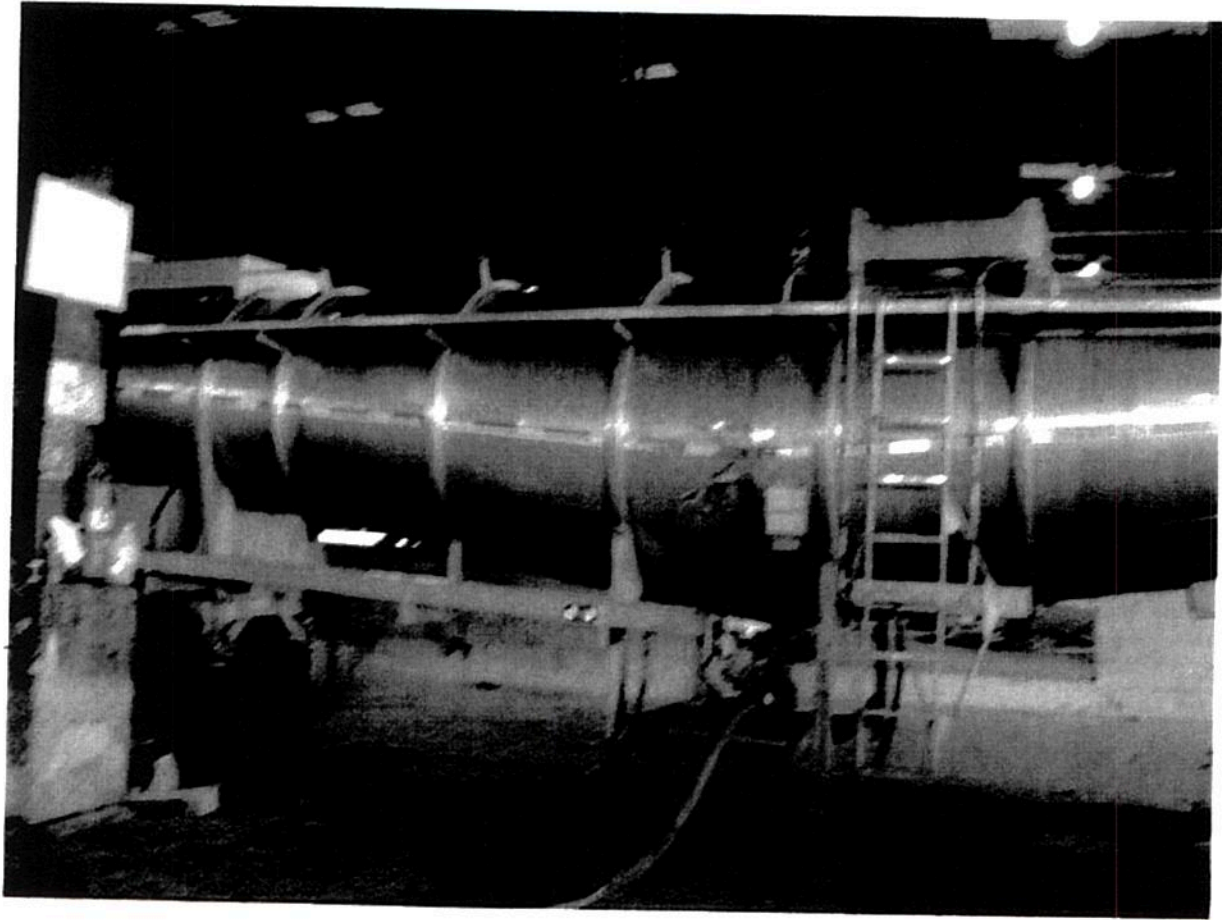


Photo 5 – Tanker truck located in Waste Bulking and Unloading Area

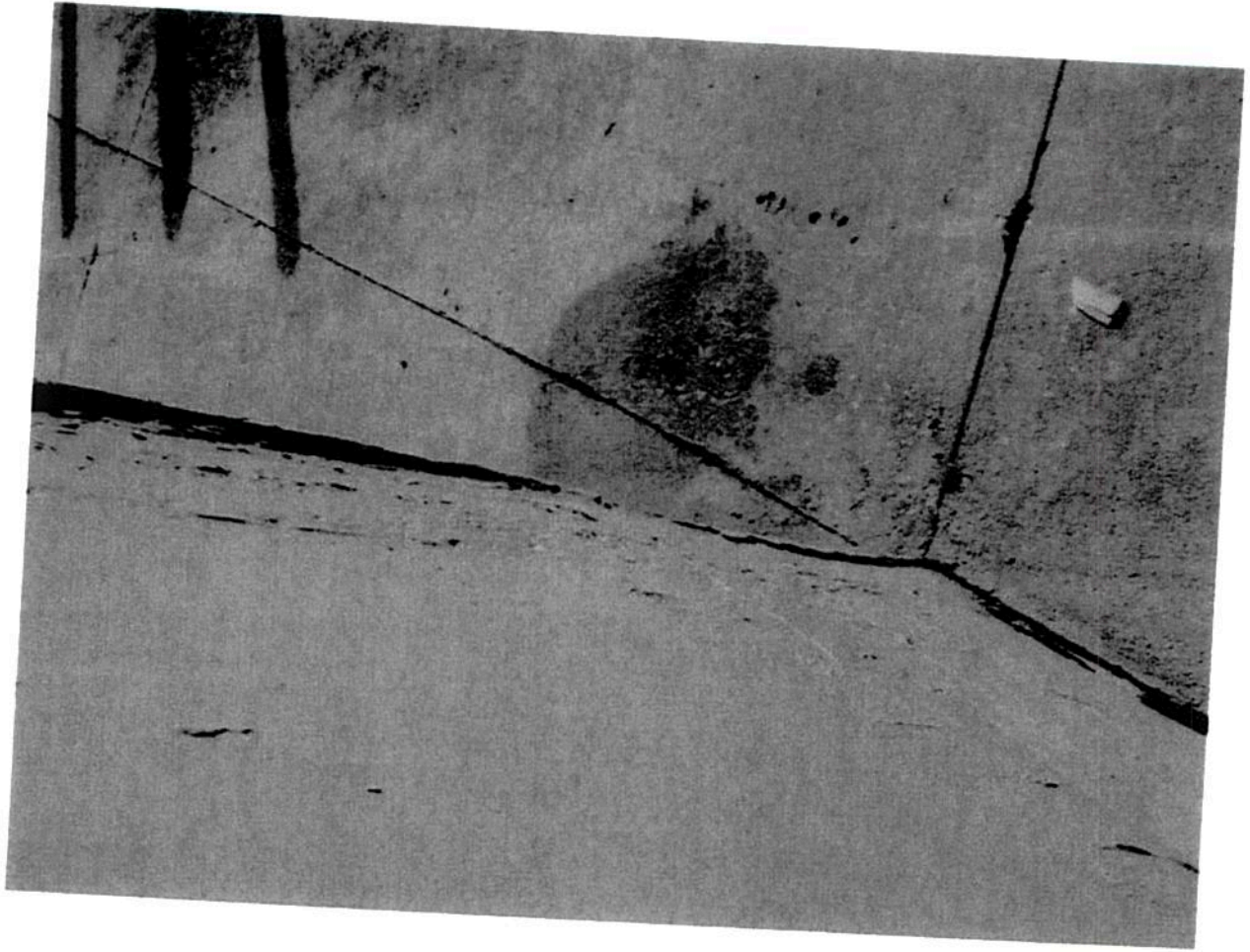


Photo 6 – Cracks observed in the south containment wall of the Drum Processing Area



Photo 7 – Coating missing from the floor of the Drum Processing Area





Photo 8 – Coating missing from the floor of the Drum Processing Area

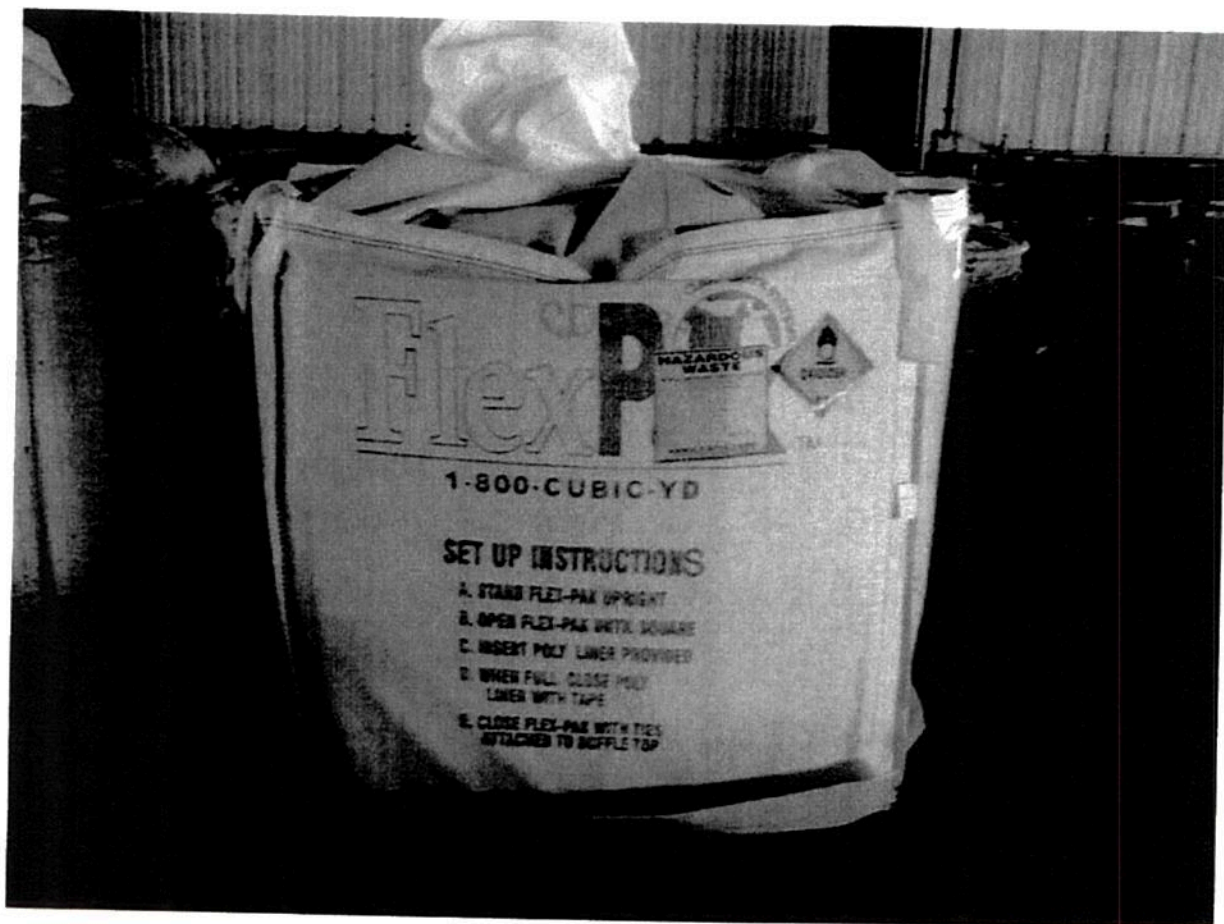


Photo 9 – Four drum w/o accumulation start date or labels in Row I-10



Photo 10 – Burned out aluminum trailer from 12/29/11 fire

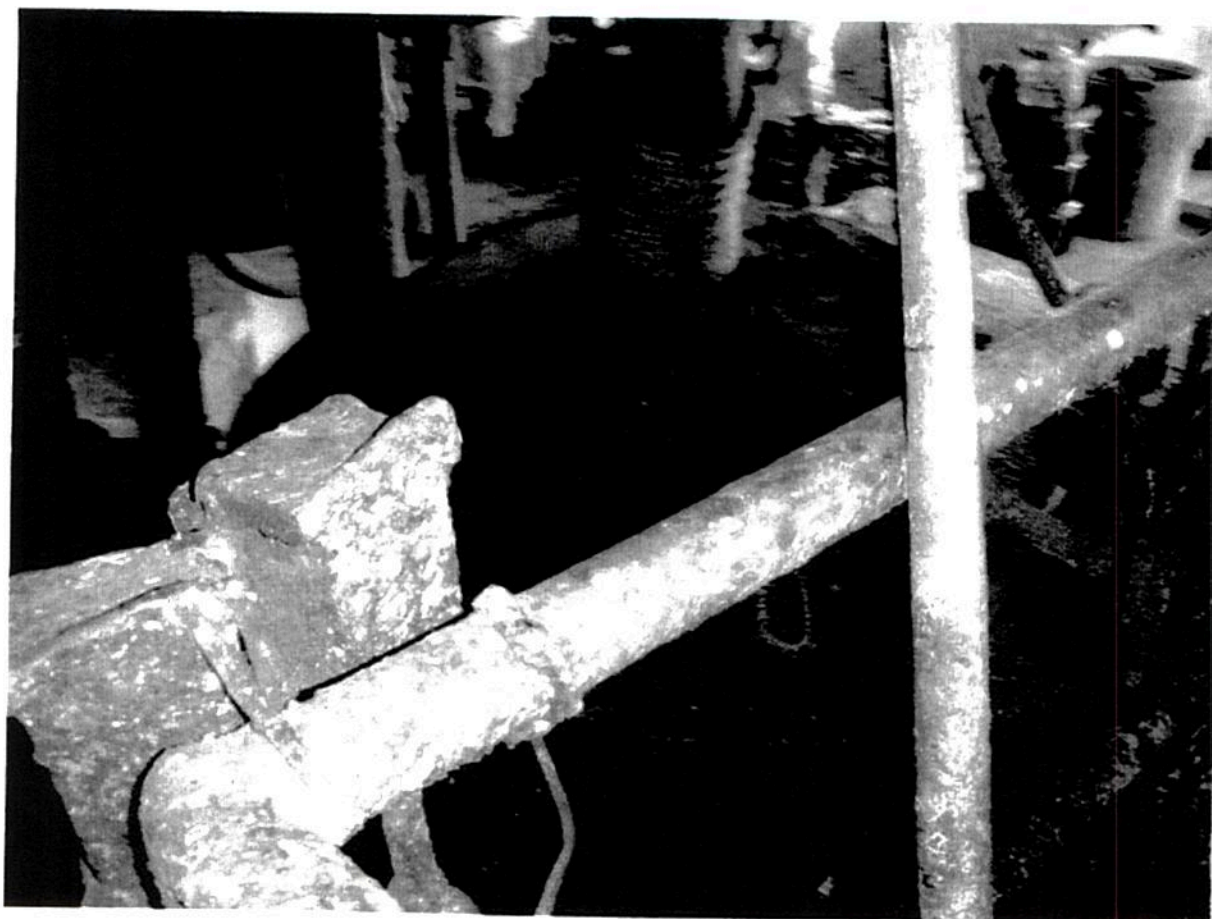


Photo 11 – Cover missing on F-3 Tank





Photo 12 – Material remaining in reception bin of Tank F-3.

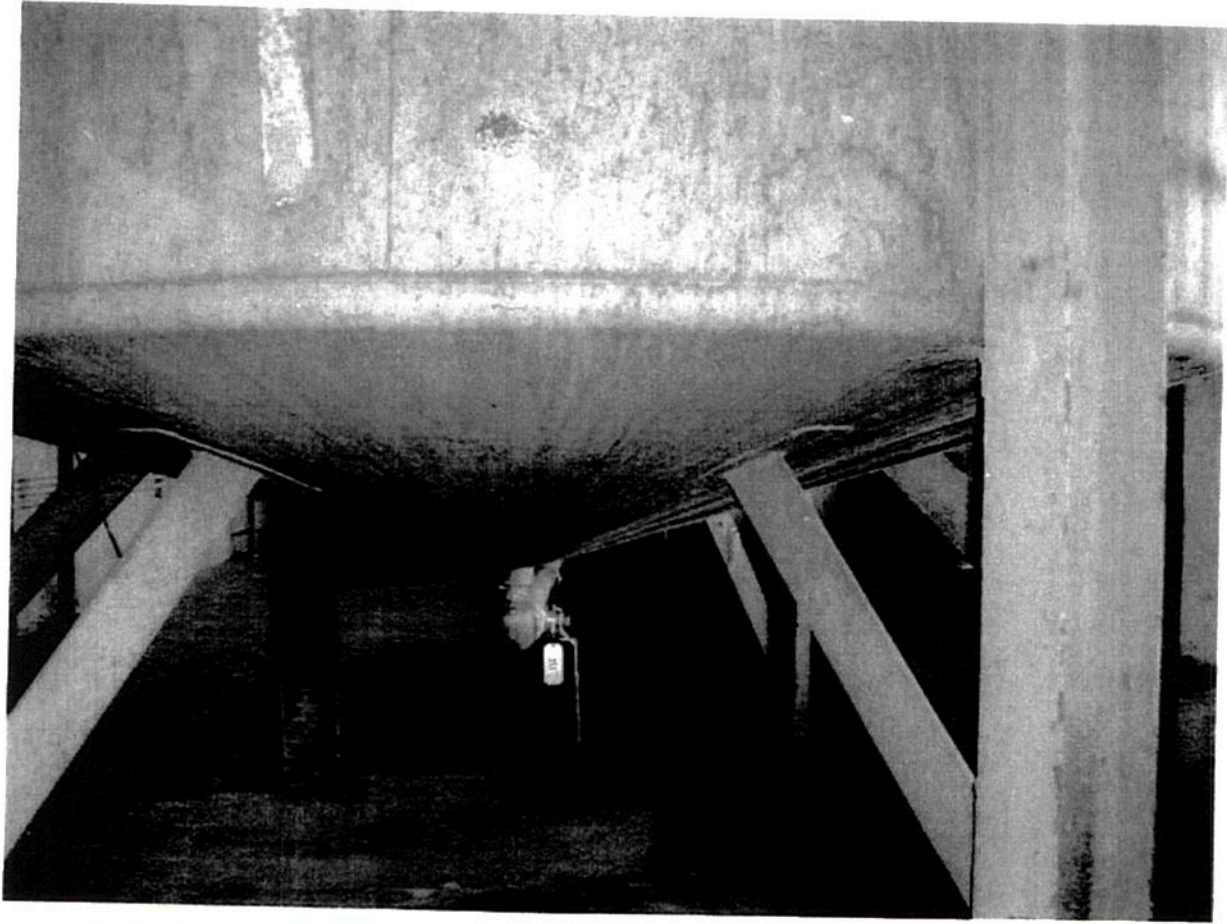


Photo 13 –Liquid hazardous waste leaking from ancillary equipment of Tank Four drum w/o accumulation start date or labels in Row I-10



Photo 14 – Liquid hazardous waste leaking from ancillary equipment of Tank Four drum w/o accumulation start date or labels in Row I-10.